

**GOTLIB LAW**

June 5, 2023

**Via ECF & Email**

The Honorable Barbara Moses  
United States Magistrate Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007  
(Email: [Moses\\_NYSDChambers@nysd.uscourts.gov](mailto:Moses_NYSDChambers@nysd.uscourts.gov))

**SO ORDERED:**

  
Barbara Moses  
United States Magistrate Judge

6/5/23

Re: United States v. Gumucio, et al. (Haven Soliman), 22 MAG 6904

Dear Judge Moses:

Carla Sanderson and I represent Haven Soliman in the above captioned case. I write, with the consent of the government and the U.S. Pretrial Services Office ("Pretrial"), to respectfully request that the terms of Ms. Soliman's bond be modified to permit her to travel to the District of Colorado, and points in between for travel, as needed for work.

Ms. Soliman was arrested on August 31, 2022 on a criminal complaint alleging criminal tax violations. Ms. Soliman was released on bond, on consent of the government, that same day. Ms. Soliman's conditions of release include, among others, her travel restricted to the Southern and Eastern Districts of New York, the Western District of Washington, the District of Oregon and points in between for travel to and from the permitted districts. Ms. Soliman has complied with all the conditions of her pretrial release to date.

The requested travel modification would allow Ms. Soliman to travel to her employer's office for various work-related purposes as needed. While Ms. Soliman's position is primarily remote, there have been various occasions since she began working there earlier this year requiring her to travel to the office in Colorado. This application would permit her to make those trips as needed without prior approval from the Court. The government (by Assistant U.S. Attorney Michael Neff) consents to this request as does Pretrial Officer Chandra Wageman.

Accordingly, we respectfully request that the Court modify the terms of Ms. Soliman's pretrial release to permit her to travel to the District of Colorado and points in between for travel as needed for work. I thank the Court for its consideration.

Respectfully submitted,

/s/

Valerie A. Gotlib

cc: Arraignment Clerks (via Email)  
Michael Neff, Assistant U.S. Attorney (via Email)  
Chandra Wageman, U.S. Pretrial Officer (via Email)